

Richard D. Coit

Executive Director

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DOCKET FILE COPY ORIGINAL

July 28, 1999

Ms. Magalie Roman-Salas  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

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FCC MAIL ROOM

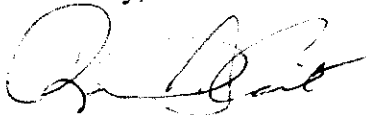
Re: CC Docket # 96-45  
In the Matter of  
Western Wireless Corporation's Petitions for Preemption  
of an Order of the South Dakota Public Utilities Commission

Dear Ms. Roman-Salas:

Enclosed please find one original and four copies of the Request for Extension of Comment Periods of the South Dakota Independent Telephone Coalition, Inc in reference to CC Docket No. 96-45. In accordance with the instructions in the Public Notice, three copies have also been sent to Sheryl Todd and an electronic disk copy has been sent to the Commission's copy contractor, International Transcription Service.

Thank you for your assistance.

Sincerely,



Richard D. Coit  
Executive Director and  
General Counsel

Attachments

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BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

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In the Matter of )  
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Western Wireless Corporation Petitions for )  
Preemption of an Order of the South Dakota )  
Public Utilities Commission )  
\_\_\_\_\_ )

CC Docket No. 96-45

REQUEST FOR EXTENSION OF COMMENT PERIODS OF THE  
SOUTH DAKOTA INDEPENDENT TELEPHONE COALITION, INC.

The South Dakota Independent Telephone Coalition, Inc. ("SDITC"), by and through its undersigned counsel, hereby respectfully requests that the Federal Communications Commission ("FCC") grant an extension of time for interested parties to file comments and reply comments in the above captioned proceeding. In support of this request, SDITC states as follows:

1. SDITC is an organization representing numerous independent, cooperative and municipal local exchange carriers in the State of South Dakota (attached as Appendix A hereto is a listing of the current SDITC member LECs). All of the SDITC member LECs have received designation as eligible telecommunications carriers within their established rural service areas from the South Dakota Public Utilities Commission ("SDPUC"). As such, all of the SDITC member companies are interested in and stand to be impacted by the outcome of this proceeding.

2. The comment dates established for this proceeding by the FCC's Public Notice dated July 19, 1999 asks for initial comments by no later than August 18, 1999 and reply comments by no later than September 2, 1999.

3. The South Dakota Public Utilities Commission ("SDPUC") has filed a "Request for Extension of Comment Periods" in this matter dated July 27, 1999. In its request, the SDPUC specifically asks that the comment periods established be altered to permit an additional 15 days beyond August 18, 1999, for initial comments and additional 15 days beyond September 2, 1999, for reply comments. SDITC supports this SDPUC request for an extension of time and with this filing makes the same request.

4. SDITC intends to submit comments in this matter on behalf of its member companies. The issues of preemption raised by the Western Wireless Corporation ("WWC") Petitions for Preemption may alter the effect of the eligible telecommunications carrier provisions found in 47 U.S.C. 214(e) and, consequently, are of great importance to the SDITC member LECs. Depending upon how the pertinent issues are addressed, this proceeding has the potential to

dramatically impact the ability of SDITC member LECs to assure universal service and the continued provision of telecommunications services throughout their established rural service areas.

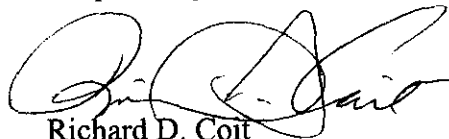
5. In order to prepare an adequate response to the WWC petition, substantial time is needed to review the underlying SDPUC record, research the legal authorities cited in WWC's filing, and analyze the various issues raised. As of this date, only 21 days remain before initial comments are due and without an extension of the comment periods, SDITC does not believe it will have sufficient time to prepare written comments which fully present SDITC's views and positions on the WWC filing.

6. SDITC is staffed with only two personnel, an administrative assistant and me. Due to other unavoidable commitments, I will be absent from the SDITC office for the next week. For this reason also additional time is sought to file comments in this proceeding.

7. Granting the 15-day extension requested will not cause hardship to any other party interested in this proceeding and will allow for the development of a more complete record in this matter and a better basis for an FCC decision.

WHEREFORE, SDITC respectfully requests an extension of the current procedural schedule to include an additional 15 days beyond August 18, 1999, for the filing of Initial Comments and an additional 15 days beyond September 2, 1999 for the filing of Reply Comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Richard D. Coit", is written over a horizontal line.

Richard D. Coit  
Executive Director and  
General Counsel

South Dakota Independent Telephone Coalition, Inc.  
207 E. Capitol Ave., Suite #206  
P.O. Box 57  
Pierre, South Dakota 57501

July 28, 1999

## CERTIFICATE OF SERVICE

I hereby certify that an original and four (4) copies of the foregoing document were mailed by Federal Express on the 27th day of July, 1999 to:

Magalie Roman Salas  
Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street SW  
Washington, DC 20554

Three (3) copies were mailed by 1st Class Mail via the U.S. Postal Service to:

Sheryl Todd  
Accounting Policy Division  
Federal Communications Commission  
445 Twelfth Street SW Room 5A523  
Washington, DC 20554

An electronic disk copy was sent by 1st Class Mail via the U.S. Postal Service to:

FCC Copy Contractor  
International Transcription Service  
1231 20<sup>th</sup> Street NW  
Washington, DC 20037

A handwritten signature in black ink, appearing to read 'Richard D. Coit', is written over a horizontal line.

Richard D. Coit, Executive Director  
South Dakota Independent Telephone Coalition  
Post Office Box 57  
207 East Capitol Avenue, Suite 206  
Pierre, SD 57501-0057

## CERTIFICATE OF SERVICE

I hereby certify that copies of the Request for Extension of Comment Periods of the South Dakota Independent Telephone Coalition, Inc. were served on the following persons by mailing the same to them by United States Post Office First Class Mail at the addresses shown below on this the 27<sup>th</sup> day of July, 1999.

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